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May 23, 2024

By ECF

Honorable Vera M. Scanlon
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Lucy York v. The City of New York et al.*, 22-cv-06432 (OEM)(VS)

Your Honor:

I am a Senior Counsel in the office of the Honorable Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, and the attorney for defendants in the above-referenced matter. Defendants write to respectfully request a forty-five day extension to all deadlines. Plaintiff has no objection to defendants' request, but does not join it in light of the Court's caution in its April 29, 2024 Minute Order. The Court previously granted defendants' requests for a sixty-day extension on March 29, 2024 and January 31, 2024, as well as, the parties' joint request for a thirty-day extension on January 5, 2024.

Defendants require an extension in order to properly respond to plaintiff's document requests, interrogatories, and requests for admission, which together amount to 137 requests, not including subparts. Due to the complexity and volume of plaintiff's discovery demands, defendants are still investigating and searching for responsive information. The demands request a vast amount of information, more than defendants originally anticipated, that require an extensive amount of time for defendants to investigate, search for, and review. In addition, the undersigned has been juggling a full schedule over the past three months, that has been heavy with litigation, and was out of the office for five days in March and two days in May. Defendants also make this request in light of the fact that I was scheduled to be on trial in three other, unrelated, matters, *Rylawn Walker v. City of New York et al.*, 22-cv-05994, beginning on April 15, 2024 before the Honorable Frederic Block; *Garfield Williams v. City of New York et al.*, 20-cv-05995, beginning on May 14, 2024 before the Honorable Lorna G. Schofield; and *Gonzalo Cortes v. Christopher Musa*, 14-cv-3014, beginning May 20, 2024 before the Honorable Robert M. Levy. Due to the large amount of work involved with preparing for these trials, I am still catching up on work in several matters. Given the volume and complexity of plaintiff's demands, amount of time and

preparation necessary to investigate and respond, and counsel's full schedule, defendants respectfully request that the extension be granted.

Due to these circumstances, defendants respectfully request a forty-five day extension to the Court-ordered deadlines contained in defendants' March 26, 2024 letter (Docket No. 25) and respectfully propose the new dates as set forth below:

- Both parties shall cooperate and use best efforts to identify the remaining John Doe Officer on or before June 3, 2024; if Plaintiff believes some document requires expedited production to accomplish this, they may file a motion seeking it after meeting and conferring with Defendants on or before July 18, 2024.
- July 15, 2024:
 - Deadline for Defendants to respond to Plaintiff's First Requests for Admission;
 - Deadline for Defendants to respond to Plaintiff's First Set of Interrogatories and Document Requests; and
 - Deadline for Plaintiff to respond to Defendants' First Set of Interrogatories and Request for Production of Documents;
- July 22, 2024:
 - Deadline for Plaintiff to file an amended complaint;
- November 12, 2024:
 - Deadline to complete all fact discovery;
- If Plaintiff is to perform expert discovery, they will serve expert disclosures, pursuant to Fed. R. Civ. Pr. 26(a)(2)(A) by December 23, 2024;
- Plaintiff's Initial expert report will be served by January 20, 2025;
- Defendants' Rebuttal expert report will be served by February 20, 2025;
- All discovery, including expert depositions, will be completed by April 21, 2025, and the parties will file a joint letter on that same date certifying the close of all discovery.

Thank you for your time and consideration of this request.

Respectfully submitted,

Peter Scutero /s

Senior Counsel
Special Federal Litigation Division

cc: ALL COUNSEL (via ECF)